

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

MICHAEL DEAN LOCKARD,

\*

Plaintiff

\*

v.

\*

Civil Action No.: \_\_\_\_\_

STAR COACHES, INC.,

\*

Defendant

\*

\* \* \* \* \*

**NOTICE OF REMOVAL**

Petitioner/Defendant Star Coaches, Inc. (hereinafter “Star”), by and through its undersigned attorneys, pursuant to 28 U.S.C. §1441 *et. seq.*, file this Notice of Removal of this action from the Circuit Court for Baltimore County, Maryland, in which it is now pending, to the United States District Court for the District of Maryland, and in support thereof respectfully avers as follows:

1. Petitioner/Defendant Star has been named as a Defendant in a suit filed in the Circuit Court for Cecil County, Case No.: C-03-CV-20-001317. Plaintiff, Michael Dean Lockard (hereinafter “Plaintiff”) filed his Complaint naming Star on March 25, 2020. Petitioner/Defendant Star accepted service of the Complaint on April 23, 2021.

2. The above-entitled matter is a civil action in which Plaintiff seeks compensation against Petitioner/Defendant Star for alleged bodily injury arising from a motor vehicle collision involving Petitioner/Defendant Star and Plaintiff.

3. The above-entitled action is one in which this Court has original jurisdiction pursuant to Title 28 U.S.C. §1332. Petitioner/Defendant Star seeks to remove this action to this Court under Title 28 U.S.C. §1441.

4. Plaintiff is a resident of Maryland, residing at 19 East Chatsworth Road, Reisterstown, Maryland 21136.

5. Petitioner/Defendant Star is incorporated in Georgia and its principal corporate office is located at 2051 Marietta Boulevard, NW, Atlanta, Georgia.

6. Petitioner/Defendant Star is entitled to removal because there is complete diversity of citizenship between the parties and the amount in controversy exceeds \$75,000.00.

7. Pursuant to Local Rule 103.5(a) filed herewith are copies of the (1) Writ of Summons, (2) Complaint & Demand for Jury Trial and (3) Star's Answer to the Complaint as Exhibits 1-3 respectively.

WHEREFORE, Petitioner/Defendant Star respectfully requests that the above-entitled action be removed from the Circuit Court for Baltimore County, Maryland to the United States District Court for the District of Maryland.

Respectfully submitted,

/s/

Andrew T. Stephenson (CPF# 0006210412)

Scarlett M. Corso (CPF# 1012140162)

FRANKLIN & PROKOPIK, P.C.

The B & O Building

Two North Charles Street, Suite 600

Baltimore, MD 21201

410-752-8700 (Telephone)

410-752-6868 (Facsimile)

[astephenson@fandpnet.com](mailto:astephenson@fandpnet.com)

[scorso@fandpnet.com](mailto:scorso@fandpnet.com)

*Attorneys for Defendant, Star Coaches, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 26th day of April 2021 a copy of the foregoing Notice of Removal was served electronically and sent by first class mail, to:

David Ellin, Esq. (#9712160197) (#9712160197)  
Law Office of David Ellin, P.C.  
154 Westminster Pike  
Reisterstown, MD 21136  
Phone: 410-833-0044  
[dellin@ellinlaw.com](mailto:dellin@ellinlaw.com)  
*Attorney for Plaintiff*

\_\_\_\_\_/s/\_\_\_\_\_  
Scarlett M. Corso